

Response Deadline: October 14, 2011 at 4:00 p.m. (Eastern Time)
Hearing Date and Time: October 27, 2011 at 10:00 a.m. (Eastern Time)

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4900
Facsimile: (212) 701-5988
Dennis E. Glazer
James I. McClammy

Counsel for International Bank for Reconstruction and Development

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x
	:
In re	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS, INC., <i>et al.</i> ,	: Case No. 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
	:
-----	x

**CORRECTED NOTICE OF MOTION OF INTERNATIONAL BANK FOR
RECONSTRUCTION AND DEVELOPMENT PURSUANT TO RULE
3018(a) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
FOR TEMPORARY ALLOWANCE OF CLAIMS FOR VOTING
PURPOSES**

PLEASE TAKE NOTICE that upon the Motion of International Bank for Reconstruction and Development (the “**Moving Party**”) for entry of an order, pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure, temporarily allowing the IBRD Claims for the purpose of voting to accept or reject the Plan, dated October 5, 2011 (the “**Motion**”) [Docket No. 20591],¹ the

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Moving Party shall move this Court for an order temporarily allowing the IBRD Claims solely for the purpose of voting to accept or reject the Plan.

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed and served in accordance with the *Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures*, in each case so as to be received by the Notice Parties (with a copy to the chambers of the Honorable James M. Peck, United States Bankruptcy Judge, One Bowling Green, New York, New York 10004, Courtroom 601) no later than October 14, 2011 at 4:00 p.m.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed
and served with respect to the Motion, the relief requested in the Motion may be
granted without a hearing.

Dated: New York, New York
October 7, 2011

Davis Polk & Wardwell LLP

By: s/ James I. McClammy

Dennis E. Glazer

James I. McClammy

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue

New York, New York 10017

Telephone: (212) 450-4900

Facsimile: (212) 701-5988

Dennis E. Glazer

James I. McClammy

*Counsel for International Bank for
Reconstruction and Development*